

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JASON THOMPSON AND
KAREN THOMPSON, DEBTORS CASE NO.: 09-13837**

RESPONSE TO TRUSTEE'S MOTION TO REOPEN

Comes now, Debtors, Jason and Karen Thompson, and file this, their Response to Trustee's Motion to Reopen and in support thereof would respectfully show unto this honorable Court as follows:

(1)

Debtors admit the allegations and averments contained in paragraphs 1 through 5.

(2)

Debtors deny that the Movant is entitled to any requested relief beginning in the paragraph beginning "WHEREFORE, PREMISES CONSIDERED".

(3)

Affirmatively, Debtor Karen Thompson would show that she has a personal injury claim that arose in early 2010. This claim is the result of a failed surgical sling which was replaced on April 24, 2010. Further, Debtor Karen Thompson did not become aware that she had a cause of action until 2013 or 2014 as when these surgical implants became the subject of a class action litigation.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that the United States Trustee's Motion to Reopen be denied.

Respectfully submitted,

AKINS & ADAMS, P. A.

By: /s/ Bart M. Adams
Bart M. Adams
Attorney for Debtors

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CERTIFICATE OF SERVICE

I, Bart M. Adams, attorney of record for the Creditor, do hereby certify that the following parties, being registered with the CM/ECF system, have this day received electronic notification to:

Jeffery Levingston jleving@bellsouth.net

U. S Trustee USTPRegion05.AB.ECF@usdoj.gov

SO, CERTIFIED, this, the 7th day of July, 2020.

/s/ Bart M. Adams
Bart M. Adams
Attorney for Creditor